



# KITSAP COUNTY DEPARTMENT OF PUBLIC WORKS

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Patrick Lizon, Water Quality Assessment Coordinator  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY

AUG 14 2015

WATER QUALITY PROGRAM

August 11, 2015

RE: Request to Discuss Alignment of Growth Management Areas and Fecal Coliform Bacteria Standards as Applied to Freshwater Standards

Dear Mr. Lizon:

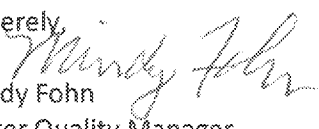
I am writing to request a meeting between Ecology and Kitsap County Public Works to discuss our concern about the designation policy for application of the fecal coliform Extraordinary Primary Contact (EPC) standard (50/100). Lands designated as Urban Growth Areas (UGA) under the Growth Management Act RCW 36.70A.110 are targeted for higher density urban development and at the same time, many are subject to the EPC standard rather than the more appropriate Primary Contact (PC) Standard (100/200). We feel the EPC standard should be reserved for more pristine waters outside the UGA and the PC standard applied to waters in UGA whereby public health is protected adequately by this standard.

Our interest lies specifically in the application of the standard to waters adjacent to UGA in Kitsap County; however, this issue affects many Puget Sound Cities and County UGA. The current standards designations were established in the 1960's. Much has changed in our land use, motivation to clean up fecal polluted waters (such as the *Clean Water Kitsap* Program), and target areas for shellfish harvest upgrades. Figure 1 shows the Urban Growth Areas for the Puget Sound region. Figure 2 shows the locations of the EPC standard areas due to designation as *Extraordinary Aquatic Life Use (AA)*, and the PC standard areas due to designation as *Excellent Aquatic Life Use (A)*. When comparing the two figures, there are many areas where the EPC standard overlaps with designated UGA.

Our intention is not to backslide or relax standards for the convenience of attainment. Our goal is revising standards to better reflect today's land use and growth patterns as directed by law while attaining beneficial uses for shellfish harvest and contact recreation. Of special interest are *Clean Water Kitsap's* aggressive efforts to clean up fecal polluted streams, resulting in shellfish harvest upgrades, and improved marine water quality. Most notable are our efforts, with the City of Poulsbo, may result in shellfish harvest upgrades in western Liberty Bay pending completion of marine water sampling by the Washington State Department of Health. Marine water sampling is 2/3 complete with all stations meeting the standard. We strongly believe that the PC standard is achievable in UGA with improved septic, agriculture, source control and stormwater retrofit programs. We also have demonstrated upgrades of shellfish beds and protection of public health to be possible when the PC standard is assigned such as in Dyes Inlet.

I look forward to working with Ecology, and if needed, including the Environmental Protection Agency Region 10, in discussions.

Sincerely,

  
Mindy Fohn  
Water Quality Manager

Cc: Christopher May, Ph.D., Kitsap County Public Works, Senior Program Manager  
David Tucker, P.E., Kitsap County Public Works, Assistant Director of Utilities  
Andrew Nelson, P.E., Kitsap County Public Works, Director  
Stuart Whitford, Pollution Identification and Corrections Program Manager, Kitsap Public Health  
Board of Kitsap County Commissioners  
Becky Erickson, Mayor, City of Poulsbo

Attachments: Figure 1 - Urban Growth Areas in Puget Sound  
Figure 2 – from Ecology website – Aquatic Life Use Designations (AA=EPC; A=PC)

